

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	
)	CIVIL NO. _____
THE STATE OF IOWA; THOMAS J.)	
VILSACK, Governor of the)	
State of Iowa)	
)	
)	
Defendants.)	
_____)	

**UNITED STATES' MOTION FOR APPROVAL
OF PROPOSED SETTLEMENT AGREEMENT**

Plaintiff United States respectfully requests this Court to enter as its order the Settlement Agreement, and the Iowa State Resource Centers Plan ("Plan") incorporated therein, as agreed to by the parties. The Settlement Agreement and Plan are attached hereto. In support of this Motion, the United States states as follows:

1. The United States is filing its Complaint concurrently with the proposed Settlement Agreement and this Motion.
2. The issue of liability has not been litigated. The parties have entered this Settlement Agreement to resolve the United States' investigation of conditions at Woodward State Resource Center, and Glenwood State Resource Center, conducted pursuant to the Civil Rights of Institutionalized Persons Act, 42 U.S.C. § 1997.

3. This Settlement Agreement is a fair, reasonable, and adequate resolution of the allegations in the United States' Complaint.

4. The United States asks the Court to approve this Decree without a full hearing on the merits, on the basis of the United States' Complaint and the above stipulation.

5. A proposed order is appended to the Settlement Agreement submitted herewith.

Wherefore, the United States requests that this Court sign and enter the attached Settlement Agreement as an order and judgment of the Court.

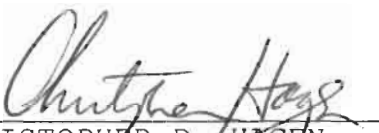
Respectfully submitted,

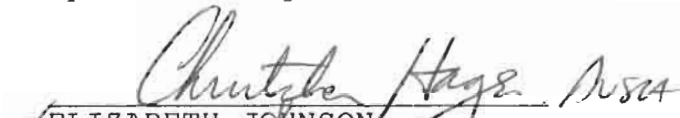
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